

FEDERAL EXPRESS CORPORATION  
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Attorneys for Defendant  
FEDERAL EXPRESS CORPORATION,

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

	)	Case No. C04-0098 SI
	)	
EDWARD ALVARADO, JOHN AZZAM,	)	<b>DEFENDANT’S ADMINISTRATIVE</b>
CHARLOTTE BOSWELL, TANDA BROWN,	)	<b>MOTION FOR LEAVE TO FILE</b>
BERTHA DUENAS, PERNELL EVANS,	)	<b>UNDER SEAL (1) PARKER’S</b>
CHARLES GIBBS, JANICE LEWIS, MARIA	)	<b><i>SATCHELL</i> TIME RECORDS, (2)</b>
MUNOZ, KEVIN NEELY, LORE PAOGOFIE,	)	<b>PARKER’S TELEPHONE RECORDS,</b>
DYRONN THEODORE, LASONIA WALKER)	)	<b>(3) PARKER’S PERSONAL</b>
and CHRISTOPHER WILKERSON,	)	<b>COMPUTER RECORDS AND (4)</b>
	)	<b>CERTAIN PORTIONS OF THE</b>
Plaintiffs,	)	<b>PARTIES’ PLEADINGS THAT</b>
v.	)	<b>REFERENCE THESE MATERIALS,</b>
	)	<b>INCLUDING (A) DECLARATION OF</b>
FEDEX CORPORATION, a Delaware	)	<b>BARAK J. BABCOCK IN SUPPORT OF</b>
corporation, dba FEDEX EXPRESS,	)	<b>DEFENDANT’S MOTION TO COMPEL</b>
	)	<b>DISCOVERY AND (B) DEFENDANT’S</b>
Defendant.	)	<b>REPLY MEMORANDUM IN SUPPORT</b>
	)	<b>OF ITS MOTION TO COMPEL</b>
	)	<b>DISCOVERY</b>

Judge: Hon. Susan Illston

Defendant's Administrative Motion For Leave To File Under Seal (1) Parker's *Satchell* Time Records, (2) Parker's Telephone Records, (3) Parker's Personal Computer Records And (4) Certain Portions Of The Parties' Pleadings That Reference These Materials, Including (A) Declaration Of Barak J. Babcock In Support Of Defendant's Motion To Compel Discovery And (B) Defendant's Reply Memorandum In Support Of Its Motion To Compel Discovery, Case No. C04-0098 SI

1 Defendant, Federal Express Corporation, hereby moves the Court pursuant to Civil L.R.  
2 7-11 and 79.5(b) to file under seal (1) Parker's *Satchell* time records, (2) Parker's telephone  
3 records, (3) Parker's personal computer records and (4) certain portions of the Parties' pleadings  
4 that reference these materials, including (A) Declaration of Barak J. Babcock in Support of  
5 Defendant's Motion to Compel Discovery and (B) Defendant's Reply Memorandum in Support  
6 of Its Motion to Compel Discovery. FedEx submits the following in support of its Motion:  
7

8 1. The Special Master issued an Order (Docket No. 1378) directing FedEx to file  
9 Parker's *Satchell* time records under seal.

10 2. Additionally, in discovery, FedEx received Parker's telephone records and  
11 personal computer records, which Parker believes should be filed under seal.  
12

13 3. The *Satchell* time records and Parker's telephone records and personal computer  
14 records are (or will be) discussed in future pleadings in this Court regarding Parker's fee  
15 petitions.

16 4. FedEx requests that the Court permit it to file under seal exhibits to the  
17 Declaration of Barak J. Babcock in Support of Defendant's Motion to Compel Discovery, which  
18 contain Parker's *Satchell* time records, telephone records and computer records.  
19

20 5. FedEx further requests that the Court permit it to file the portion of Defendant's  
21 Reply Memorandum in Support of Its Motion to Compel Discovery, which directly quotes from  
22 the *Satchell* time records under seal.

23 6. Finally, FedEx requests that the Court issue an Order permitting the Parties to file  
24 portions of future pleadings, which directly quote Parker's *Satchell* time records, telephone  
25 records and/or computer records, under seal with the Court.

26 7. Should the Court grant the requested relief, FedEx will file "publicly" its  
27 pleadings and only redact the portions of the pleading that references Parker's *Satchell* time  
28

1 records, telephone records and/or computer records. FedEx will then file under seal a copy of  
2 the non-redacted pleading.

3 For these reasons, FedEx respectfully requests that the Court issue an Order permitting  
4 FedEx to file under seal (1) Parker's *Satchell* time records, (2) Parker's telephone records, (3)  
5 Parker's personal computer records and (4) certain portions of the Parties' future pleadings that  
6 directly quote these materials.  
7

8  
9 DATED: April 15, 2009.

FEDERAL EXPRESS CORPORATION

10 By: /s/ Barak J. Babcock  
11 Barak J. Babcock  
12 Attorneys for Defendant  
13 Federal Express Corporation  
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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

EDWARD ALVARADO, JOHN AZZAM,  
CHARLOTTE BOSWELL, TANDA BROWN,  
BERTHA DUENAS, PERNELL EVANS,  
CHARLES GIBBS, JANICE LEWIS, MARIA  
MUNOZ, KEVIN NEELY, LORE PAOGOFIE,  
DYRONN THEODORE, LASONIA WALKER  
and CHRISTOPHER WILKERSON,

Plaintiffs,

v.

FEDEX CORPORATION, a Delaware  
corporation, dba FEDEX EXPRESS,

Defendant.

Case No. C04-0098 SI

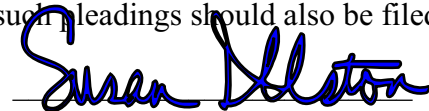
**[PROPOSED] ORDER PERMITTING  
THE FILING OF PARKER'S  
SATCHELL TIME RECORDS,  
PARKER'S TELEPHONE RECORDS,  
AND PARKER'S COMPUTER  
RECORDS AND PORTIONS OF  
PLEADINGS THAT DISCUSS SUCH  
RECORDS UNDER SEAL**

Judge: Hon. Susan Illston

Having reviewed the relevant pleadings, the Court GRANTS Defendant's Administrative Motion to seal (1) Parker's *Satchell* time records, (2) Parker's telephone records, (3) Parker's personal computer records and (4) certain portions of the Parties' future pleadings that reference these materials, including (A) the Declaration of Barak J. Babcock in Support of Defendant's Motion to Compel Discovery; and, (B) Defendant's Reply Memorandum in Support of Its Motion to Compel Discovery.

**IT IS HEREBY ORDERED** that (1) Parker's *Satchell* time records, (2) Parker's telephone records, and (3) Parker's personal computer records should be filed under seal.

**IT IS FURTHER ORDERED** that if the Parties should directly quote any of these materials in future pleadings that those portions of such pleadings should also be filed under seal.



Honorable Susan Illston  
U.S. District Court Judge